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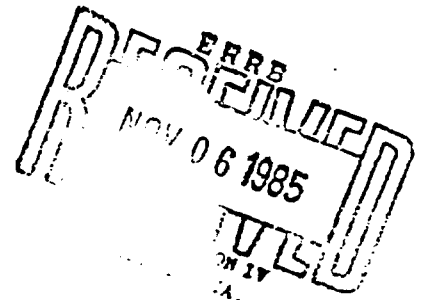
**Chevron Chemical Company**

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J. N. Stambolis  
Supervisor, Facilities Planning  
Environment & Health Protection

November 4, 1985

Lees Lane Landfill  
Feasibility Study



Ms. Beverly Houston  
Emergency and Remedial Response Branch  
U.S. Environmental Protection Agency  
345 Courtland Street, N.E.,  
Atlanta, GA 30365

Dear Ms. Houston:

This is to provide our comments on the Lees Lane Landfill Feasibility Study. Based upon our review of EPA's summary of remedial action alternatives, alternative 3 appears to provide the best mitigation of the contamination at the site with the minimal public health and community concerns using proven technology.

We believe the choice of this alternative is supported by the fact that the public health assessment concluded that there was no evidence of a public health or environmental threat due to the site at this time. However, options 1 and 2 will not meet the public health recommendation of surface waste removal. Option 4 would meet this, however, capping may not be justified nor effective against infiltration of the Ohio River during flooding. Options 5 and 6 have public health concerns of gas and particulate migration during excavation and concerns of transporting wastes through Riverside Gardens. Furthermore, in light of the minimal public health and environmental threat the site poses, we do not believe it would be cost effective to spend the dollars called for in alternatives 4, 5, and 6.

The remedial measures in alternative 3 address the primary health and environmental concerns. The EPA summary indicates that alternative 3 uses proven technology and has minimal public health concerns. Ongoing monitoring will evaluate the long-term effectiveness of these measures and will establish if there is a problem with leachate and waste migration which requires further action.

We appreciate your addressing our comments in the Responsiveness Summary and including us on the Lees Lane hazardous waste site mailing list.

Sincerely,

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